

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA,

Criminal Division

VS.

Criminal Nos.: 14-205

PRICE MONTGOMERY,
Defendant.

Judge Mark R. Hornak

**MOTION TO ACCESS FPD OR OTHER AUTHORIZED SERVICE
PROVIDER LAPTOP IN THE ALLEGHENY COUNTY JAIL**

AND NOW, comes, Defendant, Price Montgomery, by and through, counsel and co-counsel of record, Jay T. McCamic, Esq., and Douglas Sughrue, Esq., respectfully filing this motion to access FPD or other authorized service provider laptop in the ACJ and in support thereof the following is a statement:

1. Defendant, Price Montgomery, is presently incarcerated in the Allegheny County Jail.
 2. Rule 16 materials, discovery, and other legal research in possession of Mr. Montgomery while at the NEOCC and now at the ACJ is voluminous, in electronic form, on a multi-terabyte hard drive and storage media (CDs/DVDs) and contain documents in .PDF format as well as audio and video files.
 3. Prior hereto in other matters, the Federal Public Defenders Office has made various laptop computers available to all incarcerated defendants onto which my litigation support person, Mr. Ganley, can load Mr. Montgomery's electronic discovery and legal research CDs for review by Mr. Montgomery.
 6. The Warden of the ACJ will not permit Mr. Montgomery to access said laptops containing his materials unless a court order provides that Mr. Montgomery is a defendant requiring said access.

WHEREFORE, Defendant, Price Montgomery, requests that this Honorable Court grant this motion to access FPD or other authorized service provider laptop in the ACJ and issue and Order directing the Warden of the Allegheny County Jail to permit Mr. Montgomery to access and use the FPD or other authorized service provider laptops containing the relevant electronic data. Alternatively, Defendant requests a hearing be scheduled on this matter.

Respectfully submitted,

/s/ Jay T. McCamic
Jay T. McCamic, Esquire
Counsel for Mr. Montgomery

/s/ Douglas Sughrue
Douglas Sughrue, Esquire
Additional Counsel for Mr. Montgomery